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9
10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **LOS ANGELES DIVISION**

13 In re

Chapter 7

14 GIRARDI KEESE

Case No. 2:20-bk-21022-BR

15 Debtor.

**WITHDRAWAL OF MOTION FOR
RELIEF FROM STAY**

Hearing Date

Date: March 2, 2021

Time: 10:00 a.m.

Place: Courtroom 1668 via ZoomGov

Web Address:

18 <https://cacb.zoomgov.com/j/1605276951>

19 Meeting ID: 1605276951

Password: 123456

20 Telephone: (646) 828-7666

On December 18, 2020, involuntary chapter 7 petitions were filed against Thomas Vincent Girardi and Girardi Keese, commencing the cases *In re Thomas Vincent Girardi*, Case No. 2:20-bk-21020 and *In re Girardi Keese*, Case No. 2:20-bk-21022. On December 30, 2020, Frantz Law Group, APLC (“Frantz”) filed the *Notice of Motion and Motion for Relief from the Automatic Stay Under 11 U.S.C. § 362 (with supporting declarations) (Action in Nonbankruptcy Forum)* [ECF 31] (the “Motion”), which is set for hearing on March 2, 2021 at 10:00 a.m. [ECF 32, 33, 110] (the “Hearing”).¹

On February 12, 2021, the Court entered the *Order Granting Trustee’s Emergency Motion for Order: (1) Approving Compromise with Frantz Law Group, APLC ... (2) Authorizing the Assignment of the Estate’s Interests in the Southern California Gas Leak Litigation ... ; and (3) Authorizing Rejection of the Assumption and Lien Agreement ...* [ECF 187], which among other things, authorized the Trustee to enter into that certain Second Amended Settlement Agreement by and between the Trustee and Frantz (“Agreement”) [ECF 161]. Pursuant to the Agreement, upon approval of the agreement, the Motion “shall be withdrawn.” ECF 161 at 11 (Agreement § 21).

Pursuant to the terms of the Agreement, Frantz hereby withdraws the Motion.

DATED: February 22, 2021

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Eric Winston
Kenneth Chiate
John Shaffer
Eric Winston
Razmig Izakelian
Attorneys for Frantz Law Group, APLC

¹ Certain parties filed oppositions to the Motion, including Virage SPV1, LLC [ECF 64], the chapter 7 trustee (“Trustee”) [ECF 101], California Attorney Lending II [ECF 103], and Robert Keese, Jill Callahan as successor in interest to James Callahan, John Abassian, Kimberly Archie, Virginia Antonio, and Erika Saldana [ECF 105]. Frantz has filed a reply to Virage SPV1, LLC’s opposition [ECF 95], and the deadline to file a reply to the remaining oppositions is February 23, 2021 [ECF 110].

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled: Withdrawal of Motion for Relief from Stay

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On February 22, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____ I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/22/21
Date

Razmig Izakelian
Printed Name

/s/ Razmig Izakelian
Signature

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